

1 MICHAEL F. BOHN, ESQ.  
Nevada Bar No.: 1641  
2 [mbohn@bohnlawfirm.com](mailto:mbohn@bohnlawfirm.com)  
ADAM R. TRIPPIEDI, ESQ.  
3 Nevada Bar No. 12294  
[atrippiedi@bohnlawfirm.com](mailto:atrippiedi@bohnlawfirm.com)  
4 LAW OFFICES OF  
MICHAEL F. BOHN, ESQ., LTD.  
5 2260 Corporate Circle, Ste. 480  
Henderson, Nevada 89074  
6 (702) 642-3113/ (702) 642-9766 FAX  
Attorney for defendant Daisy Trust

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 THE BANK OF NEW YORK MELLON F/K/A  
THE BANK OF NEW YORK AS TRUSTEE  
11 FOR THE CERTIFICATEHOLDERS OF  
CWMBS, INC., CHL MORTGAGE PASS  
12 THROUGH TRUST 2004-29, MORTGAGE  
PASS-THROUGH CERTIFICATES, SERIES  
13 2004-29, 2505 W. CHANDLER BLVD.,  
CHANDLER, AZ 85224

14 Plaintiff,

15 vs.

16 CASCADE HOMEOWNERS ASSOCIATION,  
INC.; DAISY TRUST; AND ABSOLUTE  
17 COLLECTION SERVICES, LLC,  
Defendants.

18  
19 DAISY TRUST,

20 Counterclaimant,

21 vs.

22 THE BANK OF NEW YORK MELLON F/K/A  
THE BANK OF NEW YORK AS TRUSTEE  
23 FOR THE CERTIFICATEHOLDERS OF  
CWMBS, INC., CHL MORTGAGE PASS  
THROUGH TRUST 2004-29, MORTGAGE  
24 PASS-THROUGH CERTIFICATES, SERIES  
2004-29, 2505 W. CHANDLER BLVD.,  
25 CHANDLER, AZ 85224

26 Counter-defendant.

27 CASCADE HOMEOWNERS ASSOCIATION,

CASE NO.: 2:16-cv-01317-JCM-GWF

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR DAISY  
TRUST'S OPPOSITION TO SECOND  
MOTION FOR SUMMARY JUDGMENT**

**(Second Request)**

1 IT IS HEREBY STIPULATED AND AGREED by and between defendant Daisy Trust, by and  
2 through its attorney, Adam R. Trippiedi, Esq.; and plaintiff The Bank of New York Mellon f/k/a the Bank  
3 of New York as Trustee for the Certificateholders of CWMBS, Inc., CHL Mortgage Pass Through Trust  
4 2004-29, Mortgage Pass-Through Certificates, Series 2004-29, 2505 W. Chandler Blvd., Chandler, AZ  
5 85224, by and through its attorney, William S. Habdas, Esq., as follows:

6 1. On September 30, 2019, plaintiff filed a second motion for summary judgment (ECF 71).

7 2. The parties have reached settlement in principle but require additional time to reach agreement  
8 on all terms of the settlement.

9 3. Based on the anticipated settlement, and in an effort to conserve the parties' resources and  
10 judicial resources, the parties agree that defendant Daisy Trust's opposition to plaintiff's second motion  
11 for summary judgment shall be due January 21, 2020.

12 4. Plaintiff's reply in support of its second motion for summary judgment shall be due February  
13 3, 2020.

14 5. This request is made in good faith and not for purposes of delay.

15 DATED this 21st day of November, 2019.

16 LAW OFFICES OF  
17 MICHAEL F. BOHN, ESQ. LTD.

AKERMAN LLP

18 By: /s/ Michael F. Bohn, Esq. /  
19 Michael F. Bohn, Esq.  
20 Adam R. Trippiedi, Esq.  
21 2260 Corporate Circle, Suite 480  
Henderson, Nevada 89074  
Attorney for defendant Daisy Trust

By: /s/ William S. Habdas, Esq. /  
Ariel E. Stern, Esq.  
William S. Habdas, Esq.  
1635 Village Center Cir, Ste 200  
Las Vegas, Nevada 89134  
Attorney for plaintiff

22 ///

23 ///

24 ///

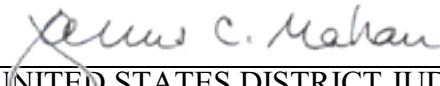
**ORDER**

IT IS HEREBY ORDERED as follows:

1. Daisy Trust's opposition to plaintiff's second motion for summary judgment shall be due January 21, 2020.

2. Plaintiff's reply in support of its second motion for summary judgment shall be due February 3, 2020.

IT IS SO ORDERED November 21, 2019.

  
UNITED STATES DISTRICT JUDGE  
2:16-cv-01317-JCM-GWF